

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAWAUN FRASER,

Plaintiff,

-against-

THE CITY OF NEW YORK,
UNDERCOVER OFFICER NUMBER 84,
DETECTIVE MATTHEW REGINA, AND
DETECTIVE JASON DELTORO,
INDIVIDUALLY AND AS MEMBERS OF
THE NEW YORK CITY POLICE
DEPARTMENT,

Defendants.

20-cv-4926 (CM) (OTW)

**Plaintiff's proposed
verdict sheet (amended)**

VERDICT SHEET ON LIABILITY

Question 1:

Has Jawaun Fraser proven by a preponderance of the evidence that the following defendants fabricated evidence and thereby denied him his right to a fair trial?

Undercover Officer Number 84: Yes _____ No _____

Matthew Regina: Yes _____ No _____

Jason Deltoro: Yes _____ No _____

Please proceed to Question 2.

Question 2:

Has Jawaun Fraser proven by a preponderance of the evidence that the following defendants caused the initiation of his criminal prosecution without probable cause?

Undercover Officer Number 84: Yes _____ No _____

Matthew Regina: Yes _____ No _____

Jason Deltoro: Yes _____ No _____

Please proceed to Question 3.

Question 3:

Has Jawaun Fraser proven by a preponderance of the evidence that the following defendants violated his rights to due process and a fair trial by withholding impeachment evidence from the prosecution?

Undercover Officer Number 84: Yes _____ No _____

Jason Deltoro: Yes _____ No _____

Please proceed to Question 4.

Question 4:

Has Jawaun Fraser proven by a preponderance of the evidence that a policy, practice, and/or custom of the City of New York was a substantial cause of the withholding of impeachment evidence from him at his criminal trial?

Yes _____ No _____

If the answer to Questions 1, 2, 3, and 4 is no as to all defendants, you have reached a verdict. Please skip the remaining questions and sign below.

If the answer to any of these four questions is yes for any defendant(s), please proceed to Questions 5 and 6.

VERDICT SHEET ON DAMAGES

Question 5:

If the answer to questions 1, 2, 3, and/or 4 was yes as to any defendant or defendants, state the total amount of compensatory damages to which plaintiff is entitled for the violation(s) of his constitutional rights.

Fabricating evidence \$ _____

Initiating prosecution without probable cause \$ _____

Withholding evidence \$ _____

Please proceed to Question 6.

Question 6:

Has plaintiff proven by a preponderance of the evidence that he is entitled to punitive damages against any of the following defendants as a result of the violation(s) of his constitutional rights?

Undercover Officer Number 84: Yes _____ No _____

If yes, in what amount? \$ _____

Matthew Regina: Yes _____ No _____

If yes, in what amount? \$ _____

Jason Deltoro: Yes _____ No _____

If yes, in what amount? \$ _____

YOUR DELIBERATIONS ARE COMPLETE.

Dated: _____, 2021

FOREPERSON